

JUDGE TORRES

22 MC 00110

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE SUBPOENA TO ACKMAN-ZIFF REAL ESTATE GROUP, LLC	)	Misc. Action No. _____
)		
)		
NEXTDOOR, INC., a Delaware Corporation,	)	
)		
Plaintiff,	)	
)		
v.	)	
)		
420 TAYLOR VENTURES, LLC, a Delaware Limited Liability Company, NT 420 TAYLOR OWNER LLC, a Delaware Limited Liability Company, NH 420 TAYLOR OWNER LLC, a Delaware Limited Liability Company, 420 TAYLOR HOLDINGS OWNER LLC, a Delaware Limited Liability Company, SEVEN EQUITY GROUP, LLC, and DOES 1-50,	)	Civil Action No. 3:21-cv-03341-EMC United States District Court for the Northern District of California
)		
Defendants.	)	
)		

## NOTICE OF MOTION TO QUASH

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and pursuant to Federal Rule of Civil Procedure 45(d)(3) and Local Civil Rule 6.1, 420 Taylor Ventures, LLC, NT 420 Taylor Owner LLC, NH 420 Taylor Owner LLC, 420 Taylor Holdings Owner LLC, and Seven Equity Group, LLC (collectively, the “Moving Parties”), by and through the undersigned counsel, respectfully moves this Court to quash the subpoena *duces tecum* served by Nextdoor, Inc. on non-party Ackman-Ziff Real Estate Group, LLC. In the alternative, Moving Parties respectfully request that the Court enter an order substantially limiting the scope of the subpoena, along with such other and further relief as this Court deems just and proper.

[SIGNATURE ON NEXT PAGE]

Respectfully submitted,

Dated: April 12, 2022

/s/ Lewis Zirogiannis  
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420 Taylor Owner LLC, NH 420 Taylor Owner  
LLC, 420 Taylor Holdings Owner LLC and  
Seven Equity Group, LLC*